

1 DAVID T. BLAKE (# 11059)
2 Counsel for Summit Estate Inc.
3 1671 W. Horizon Ridge Parkway, Suite 200
4 Henderson, NV 89012
5 Phone: (702) 476-5900
6 dave@clearcounsel.com

7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF NEVADA**

9 PAUL PONOMARENKO, an individual,
10
11 Plaintiff,

12 v.

13 PROJECT VEGAS MANSION, corporate entity
14 of unknown form, NATHAN SHAPIRO, an
15 individual; and DOES 1 through 50,
16
17 Defendants.

18 NATHAN SHAPIRO, an individual,
19
20 Counterclaimant,

21 v.

22 PAUL PONOMARENKO, an individual, DOES
23 1 through 50 and ROE business entities 51-100,
24
25 Counterdefendants.

26 NATHAN SHAPIRO, an individual,
27
28 Third Party Plaintiff,

vs.

SUMMIT ESTATE, INC. DBA SUMMIT
ESTATE RECOVERY CENTER, a California
corporation; LUKE GERHARD KROGH, an
individual; DOES 1 through 50 and ROE business
entities 51 through 100,
Third Party Defendants.

Case No.: 2:18-cv-00216-RFB-CWH

**MOTION TO PERMIT WITHDRAWAL
OF CALIFORNIA COUNSEL SANJIV N.
SINGH AND MICHAEL INDRAJANA AND
TO PERMIT SUBSTITUTION OF NEW
COUNSEL FOR SUMMIT ESTATE, INC.
AND PAUL PONOMARENKO**

1 TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:
2 PLEASE TAKE NOTICE that Plaintiff Paul Ponomarenko and Third-Party Defendant
3 Summit Estate, Inc. hereby move the Court for an order permitting withdrawal of California counsel
4 Sanjiv Nand Singh and Michael Budi Indrajana as counsel of record and permitting the filing of a
5 substitution of counsel whereby David T. Blake, Esq. will assume representation for both Mr.
6 Ponomarenko and Summit Estate, Inc.
7

8 This motion is made pursuant to Local Rule IA 11-6 and in response to the Court's order
9 (Dkt. No. 115) requiring that Summit Estate Inc. locate counsel and have California Counsel Sanjiv
10 Singh and Michael Indrajana appear pro hac vice. Mr. Blake will assume representation for both
11 Summit Estate and Paul Ponomarenko, thereby obviating the need to have local counsel appear pro
12 hac vice.

13 This motion is based on this Notice of Motion and Motion; the accompanying Memorandum
14 of Points and Authorities, the accompanying Declaration of Paul Ponomarenko, and such other
15 matters as may be presented to the Court at the time of the hearing (if one is required); and such
16 other and further evidence and arguments as the Court may properly consider.

17 DATED: July 20, 2018.

Respectfully submitted,

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19 By: /s/ David T. Blake
20 David T. Blake, Esq. (#11059)
21 Counsel for Plaintiff Paul Ponomarenko and
22 Third-Party Defendant Summit Estate, Inc.
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Plaintiff Ponomarenko and Third-Party Defendant Summit Estate Inc. therefore move the court for the authorization to file the aforementioned substitution of counsel and permit withdrawal of California counsel who had been counsel of record when the matter was pending in California. A copy of the proposed order is filed concurrently.

Respectfully submitted,

By: /s/ David T. Blake
David T. Blake, Esq. (#11059)
Counsel for Plaintiff Paul Ponomarenko and
Third-Party Defendant Summit Estate, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 20th day of July, 2018, I served a true and accurate copy of the foregoing MOTION TO PERMIT WITHDRAWAL OF CALIFORNIA COUNSEL SANJIV N. SINGH AND MICHAEL INDRAJANA AND TO PERMIT SUBSTITUTION OF NEW COUNSEL FOR SUMMIT ESTATE, INC. AND PAUL PONOMARENKO through the Court's CM/ECF system, and via email, to the following parties:

Thomas Shaddix
Counsel for Defendant Nathan Shapiro
6166 S. Sandhill Road, Suite 146
Las Vegas, NV 89120
Phone: (702) 735-7867
thomas@shaddixlaw.com

David T. Blake, Esq.
Counsel for Summit Estate Inc.
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Henderson, NV 89012
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Sanjiv N. Singh, Esq.
Sanjiv N. Singh, a PLC
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Michael Indrajana, Esq.
Indrajana Law Group, a PLC
1650 S. Amphlett Blvd. Suite 220
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Phone: (650) 597-0928
Email: michael@indrajana.com

Paul Ponomarenko
1650 S. Amphlett Blvd. Suite 220
San Mateo, CA 94402
Phone: (650) 597-0928
Email: paul@summitestate.com

IT IS SO ORDERED.

DATED: July 24, 2018


C.W. HOFFMAN, JR.
UNITED STATES MAGISTRATE JUDGE

/s/ K.A. Gentile
An Employee of Clear Counsel Law Group

EXHIBIT “A”

EXHIBIT “A”

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EXHIBIT “B”

EXHIBIT “B”

David T. Blake, Esq. (# 11059)
CLEAR COUNSEL LAW GROUP
1671 W. Horizon Ridge Parkway, Suite 200
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(702) 924-0709 (Fax)
dave@clearcounsel.com
Attorneys for Summit Estate, Inc. dba
Summit Estate Recovery Center

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PAUL PONOMARENKO, an individual,

Plaintiff,

vs.

PROJECT VEGAS MANSION, corporate
entity of unknown form, NATHAN
SHAPIRO, an individual; and DOES 1
through 50,

Defendants

NATHAN SHAPIRO, an individual,

Counterclaimant,

vs.

PAUL PONOMARENKO, an individual,
DOES 1 THROUGH 50 and ROE business
entities 51 through 100.

Counterdefendants.

NATHAN SHAPIRO, an individual,

Third-Party Plaintiff,

vs.

SUMMIT ESTATE, INC., DBA SUMMIT
ESTATE RECOVERY CENTER, a
California corporation, LUKE GERHARD
KROGH an individual, DOES 1 through 50
and ROE business entities 51 through 100.

Third-Party Defendants.

Case No. 2:18-CV-00216-RFB-CWH

SUBSTITUTION OF ATTORNEY

1 Sanjiv N. Singh, hereby consents to the substitution of David T. Blake of Clear Counsel Law
2 Group, as attorney of record for Paul Ponomarenko and Summit Estate, Inc. in place of Sanjiv N.
3 Singh Professional Law Corporation in the above captioned matter.
4

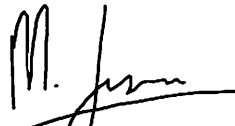
5 Dated: July 19, 2018.



6
7 Sanjiv N. Singh, Esq.
8 Sanjiv N. Singh Professional Law Corporation

9 Michael B. Indrajana hereby consents to the substitution of David T. Blake of Clear Counsel
10 Law Group, as attorney of record for Paul Ponomarenko and Summit Estate, Inc. in place of Indrajana
11 Law Group, A Professional Law Corporation., in the above captioned matter.

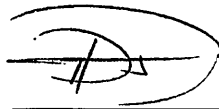
12 Dated: July 19, 2018.



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14 Michael B. Indrajana, Esq.
15 Indrajana Law Group, A Professional Law Corp.

16 Paul Ponomarenko hereby consents to the substitution of David T. Blake of Clear Counsel
17 Law Group, as attorney of record in the above captioned matter, in place of Sanjiv N. Singh, A
18 Professional Law Corp and Indrajana Law Group, A Professional Law Corporation and Mr.
19 Ponomarenko pro per, to represent Mr. Ponomarenko individually.

20 Dated: July 19, 2018.



21
22 Paul Ponomarenko, an individual

23
24 Paul Ponomarenko, on behalf of Summit Estate, Inc., hereby consents to the substitution of
25 David T. Blake of Clear Counsel Law Group, as attorney of record for Summit Estate, Inc. in place of
26 Sanjiv N. Singh, A Professional Law Corp and Indrajana Law Group, A Professional Law Corporation
27 in the above captioned matter.

28 Dated: July 19, 2018.



Paul Ponomarenko
Owner, Summit Estate Inc.

David T. Blake of the law firm Clear Counsel Law Group hereby accepts the above substitution of attorneys in the above captioned matter. I have been retained by the parties and am duly admitted to practice in this District.

Dated: July 19, 2018.

CLEAR COUNSEL LAW GROUP

David T. Blake (#11059)

APPROVED:

Dated:

UNITED STATES DISTRICT JUDGE

1 DAVID T. BLAKE (#11059)
2 Counsel for Summit Estate Inc.
3 1671 W. Horizon Ridge Parkway, Suite 200
4 Henderson, NV 89012
5 Phone: (702) 476-5900
6 dave@clearcounsel.com

7 **UNITED STATES DISTRICT COURT**
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entities 51 through 100,
Third Party Defendants.

Case No.: 2:18-cv-00216-RFB-CWH

**[PROPOSED ORDER] RE MOTION TO
PERMIT WITHDRAWAL OF
CALIFORNIA COUNSEL SANJIV N.
SINGH AND MICHAEL INDRAJANA
AND TO PERMIT SUBSTITUTION OF
NEW COUNSEL FOR SUMMIT ESTATE,
INC. AND PAUL PONOMARENKO**

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Having considered the Motion and supporting materials, the Court finds good cause and the Motion is GRANTED.

DATED: July 2018.

By: _____
U.S. Magistrate Judge

1 **CERTIFICATE OF SERVICE**

2 **I HEREBY CERTIFY** that on the 20th day of July 20, 2018, I served a true and accurate
3 copy of the foregoing PROPOSED ORDER through the Court's CM/ECF system, and via email, to
4 the following parties:

5 Thomas Shaddix
6 Counsel for Defendant Nathan Shapiro
7 6166 S. Sandhill Road, Suite 146
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10 thomas@shaddixlaw.com

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17 Sanjiv N. Singh, Esq.
18 Sanjiv N. Singh, a PLC
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22 Email: ssingh@sanjivnsingh.com

23 Michael Indrajana, Esq.
24 Indrajana Law Group, a PLC
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26 San Mateo, CA 94402
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Paul Ponomarenko
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/s/K.A. Gentile
An Employee of Clear Counsel Law Group